

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DALE PHILLIPS,	:	
Plaintiff,	:	
v.	:	Case No. 2:16-CV-880
	:	Judge Marbley
	:	Magistrate Judge Kemp
KAREN BLAIR, et al.	:	
Defendants.	:	

**STIPULATED PROTECTIVE ORDER**

In connection with the claims made by Plaintiff in the above-referenced litigation, the parties anticipate that Defendants will seek production of Plaintiff's medical records. In anticipation that such records will be requested and produced, the Court makes the following order:

1. This Order covers all medical and mental health records produced for Plaintiff Dale Phillips in connection with the above-referenced litigation.
2. All Plaintiff's medical and mental health care records produced in connection with this litigation will be used for purposes of this litigation only.
3. Plaintiff's medical and mental health care records will be released only to Defendants' counsel, Paula J. Lloyd and Pamela J. Gordon and/or their authorized agents, namely staff of counsel's office.
4. Defendants' counsel shall maintain Plaintiff's medical and mental health care records so as to protect the confidential nature of the information.
5. If Defendants' counsel intends to give copies of Plaintiff's medical or mental health care records to any person outside office staff, Defendants' counsel will require, prior to

disclosure, that such person execute the Agreement attached hereto as Exhibit A. The signed Agreement shall be maintained by Defendants' counsel until the conclusion of this action.

6. Upon final adjudication of this matter, Defendants' counsel and any person to whom copies of Plaintiff's medical or mental health records have been given, shall destroy all copies of the medical and mental health care records.
7. This Order does not govern the use of Plaintiff's medical and/or mental health care records at trial.

IT IS SO ORDERED.

/s/ Terence P. Kemp  
United States Magistrate Judge

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*Exhibit A to Stipulated  
Protective Order*

DALE PHILLIPS,	:	
	:	
Plaintiff,	:	
	:	Case No. 2:16-CV-880
v.	:	Judge Marbley
	:	Magistrate Judge Kemp
KAREN BLAIR, et al.	:	
	:	
Defendants.	:	

**ACKNOWLEDGEMENT AND AGREEMENT TO BE BOUND  
BY STIPULATED PROTECTIVE ORDER**

The undersigned hereby acknowledges that he/she has read the Stipulated Protective Order in the above-referenced litigation, which covers Plaintiff's medical and mental health care records. The undersigned understands that such records are to be used only for the purposes of the instant litigation. The undersigned agrees not to provide copies of the medical and mental health care records, received from Defendants' counsel, to any other person and further agrees to destroy copies of Plaintiff's medical and mental health care records at the conclusion of the above-referenced litigation.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_